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REPORT

OF THE

SELECT COMMITTEE ON INTELLIGENCE

ON

**PREWAR INTELLIGENCE ASSESSMENTS ABOUT POSTWAR
IRAQ**

together with

ADDITIONAL VIEWS

- Ordered to be printed-

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SELECT COMMITTEE ON INTELLIGENCE United States Senate

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PREWAR INTELLIGENCE ASSESSMENTS ABOUT POSTWAR IRAQ

Introduction

■ On February 12, 2004, the Senate Select Committee on Intelligence unanimously agreed to expand its inquiry into prewar intelligence with regard to Iraq. Among the additional areas the Committee agreed to investigate was “prewar intelligence assessments about postwar Iraq.”¹ This is the Committee’s report on that aspect of its inquiry.

■ This report describes the Committee’s methodology for reviewing prewar assessments about postwar Iraq, provides brief background on the production of two principal prewar assessments published in January 2003, summarizes other intelligence assessments from 2002-2003, and provides the Committee’s conclusions about the Intelligence Community’s prewar assessments about postwar Iraq.

Methodology

■ The Committee reviewed written intelligence assessments concerning conditions in Iraq after the removal of Saddam Hussein that were published between April 19, 1999 (shortly after enactment of the Iraq Liberation Act of 1998) and March 19, 2003, the beginning of US combat operations in Iraq. For purposes of this report, the Committee considered the postwar period to begin with the removal of Saddam from power in April 2003.

■ Documents provided to the Committee by the Intelligence Community from this period represented a variety of intelligence assessments. They ranged from short articles included in the daily publications produced by Intelligence Community agencies for senior executives, to hard-copy slides from briefing presentations made by Department of Defense analysts, to fully coordinated, inter-agency intelligence assessments that were widely disseminated throughout the federal government. The Intelligence Community provided the Committee with ■ all-source assessments.

¹ See press release from U.S. Senate Select Committee on Intelligence, February 12, 2004.



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■ In addition to reviewing written intelligence reports, Committee staff also interviewed members of the Intelligence Community, and officials in the State Department, Defense Department, and Coalition Provisional Authority.

Background

■ The Intelligence Community faced a challenging task in attempting to assess likely trends, challenges and events in post-war Iraq for three primary reasons. First, the requirement for intelligence assessments about the postwar environment represented a relatively small portion of the work on Iraq produced by Intelligence Community analysts during 2002 and 2003. The majority of assessments relating to Iraq focused on Saddam's connections to terrorism, the threat from weapons of mass destruction, and the capabilities of the Iraqi military. The National Intelligence Council (NIC), for example, produced a significant National Intelligence Estimate (NIE) in October 2002 in response to a request from the Director of Central Intelligence for an examination of Saddam's near-term military objectives, strategy, and capabilities in a war against the US and Coalition forces.² The NIC also produced an NIE about Iraq's weapons of mass destruction. The CIA's Iraq analysts, according to one study, responded to "an average of 300 policymaker tasks per month in the lead up to and during" major offensive military operations.³

■ Second, the predictive nature of the assessments about postwar Iraq meant that analysts had little intelligence collection upon which to base their judgments. Current and former intelligence officials told the Committee that intelligence reporting did not play a significant role in developing assessments about postwar Iraq because it was not an issue that was well-suited to intelligence collection. Accordingly, most prewar assessments cite relatively few intelligence sources. Analysts based their judgments primarily on regional and country expertise, historical evidence and analytic tradecraft.⁴ Overall, the assessments appropriately qualified the scope and basis for their judgments.

■ Third, analysts recognized that the policies and actions implemented on the ground in Iraq would make US and Coalition forces the "dominant influence" on the postwar environment in Iraq in the immediate aftermath of the invasion.⁵ Essentially, the task of assessing the postwar environment in Iraq was complicated by the fact that the manner in which the main political, economic, humanitarian,

² NIC: *Saddam's Preparation for War: Intentions and Capabilities*, October 2002.

³ Memo to the Director of Central Intelligence, *Lessons Learned from Military Operations in Iraq*, February 1, 2005.

⁴ This report does not examine the quantity or quality of the intelligence sources underlying the intelligence assessments on postwar Iraq.

⁵ NIC: *Principal Challenges in Post-Saddam Iraq*, January 2003, Scope Note.

[REDACTED]

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and security issues inside Iraq unfolded would “depend heavily on the events leading to Saddam’s removal.” The effects of Saddam’s ouster through Coalition military action “could vary significantly according to the duration of the war, the damage it caused, and such other factors as the size and cohesiveness of the Coalition.”⁶

Previous Reviews of Prewar Intelligence about Postwar Iraq

■ Two previous evaluations initiated by the Director of Central Intelligence (DCI) reviewed the Intelligence Community’s performance on Iraq, which included intelligence regarding the postwar situation.

■ One study, known as the Kerr Study Group report, was conducted by four retired senior intelligence officers in two phases. The group evaluated CIA and NIC assessments produced during 18 months prior to the war. The first phase reviewed national intelligence on the key questions related to Iraq up to the moment the war began. The second phase, published in 2004, compared that intelligence to new information in the aftermath of the war.⁷

■ The second evaluation, *The DCI’s Report on Intelligence Lessons Learned from Military Actions in Iraq*, reviewed the support provided by the Intelligence Community as a whole to policy and military decision-makers in the lead up to and during the active combat phases of Operation Iraqi Freedom.⁸

■ In order to acquire background on the issue, Committee staff interviewed the principal authors of the Kerr Study Group and the *Lessons Learned* review.

■ The conclusions reached by the Committee are independent of the findings by the Kerr and *DCI Lessons Learned* studies.

Prewar Assessments Coordinated Across the Intelligence Community

■ In January 2003, the NIC produced and disseminated two Intelligence Community Assessments (ICAs) focused exclusively on the issue of the postwar environment in Iraq. Like National Intelligence Estimates, the ICAs summarize in one document the coordinated views of the Intelligence Community as a whole. The two ICAs were widely disseminated among senior policymakers and within the Intelligence Community. The distribution lists for each report are included in

⁶ NIC, *Principal Challenges*, p. 1

⁷ *Studies in Intelligence*, July 29, 2004. (Richard Kerr, et al, *Collection and Analysis on Iraq: Issues for the US Intelligence Community*, July 29, 2004, Vol. 49, No. 3.)

⁸ *The DCI’s Report on Intelligence Lessons Learned from Military Actions in Iraq*, 11 February 2005.

[REDACTED]

[REDACTED]

Appendix D. The ICAs were produced in the same manner as an NIE, but their release did not require approval by the National Foreign Intelligence Board and the Director of Central Intelligence.

■ The scope notes of both reports said they were prepared “at the request of the Director of Policy Planning at the Department of State under the auspices of the National Intelligence Officer (NIO) for the Near East and South Asia.” The NIO told Committee staff that he actually suggested the assessments to State and took the initiative to produce them on the basis of a positive reaction from State’s Policy Planning Staff to his suggestion.⁹

■ One ICA, entitled *Principal Challenges in Post-Saddam Iraq*, identified and analyzed the medium- to long-term challenges that any post-Saddam authority in Iraq would necessarily face.¹⁰ The second ICA, *Regional Consequences of Regime Change in Iraq*, addressed the regional impact of a US invasion of Iraq.¹¹

■ The Committee devoted particular attention to January 2003 ICAs because they were fully-coordinated across the Intelligence Community prior to their publication. Thus, the Committee believes that the ICAs represent the best available “baseline” of prewar intelligence assessments on postwar Iraq.

■ The Committee’s conclusions are based primarily on the two ICAs. In an effort to further inform the public debate on the role of intelligence assessments in the prewar period, the Committee requested that the Director of National Intelligence declassify both of the ICAs in their entirety. These declassified documents appear in Appendices A and B.

Regional Consequences of Regime Change in Iraq

■ In *Regional Consequences of Regime Change in Iraq*, the Intelligence Community analyzed the “most important political, economic, and social consequences of regime change in Iraq – in the context of current conditions in the Middle East and South Asia – for the surrounding region over a five-year period.”

■ The analysis was based on assumptions laid out in the paper’s scope note. These included: “Saddam and key regime supporters are ousted as the result of a UN-sanctioned Coalition military campaign...; Iraqi territorial integrity remains intact and Iraq retains a defensive capability against its neighbors...; a US-backed

⁹ SSCI Committee Staff Interview with NIO for Near East and South Asia.

¹⁰ NIC, *Principal Challenges in Post-Saddam Iraq*, January 2003.

¹¹ NIC, *Regional Consequences of Regime Change in Iraq*, January 2003.

[REDACTED]

[REDACTED]

government is established with a gradual devolution to Iraqi self-governance during the five-year timeframe.”¹²

Principal Challenges in Post-Saddam Iraq

■ The second Intelligence Community Assessment of January 2003, *Principal Challenges in Post-Saddam Iraq*, examined “the internal dynamics of Iraq that will frame the challenges for whatever government succeeds the regime of Saddam Husayn.”¹³

■ According to the scope note, the assessment was not focused primarily on the “immediate humanitarian demands or need to locate weapons of mass destruction that would be handled by the Coalition military forces in the first days after a war.” Instead, the assessment discussed challenges that would “demand attention during approximately the first three to five years after Saddam departs.” Accordingly, the scope note also stated that the ICA made no projections about specific wartime scenarios or the policies of “an occupying force” in postwar Iraq.¹⁴

Other Intelligence Assessments on Postwar Iraq

■ In addition to the Intelligence Community Assessments (see Appendices A and B), individual agencies within the Intelligence Community produced dozens of more narrowly focused assessments about postwar Iraq throughout 2002 and early 2003. The Committee briefly summarized those assessments in Appendix C.

¹² NIC, *Regional Consequences*

¹³ NIC, *Principal Challenges*

¹⁴ NIC, *Principal Challenges*

[REDACTED]

CONCLUSIONS

■ Democracy

■ The Intelligence Community assessed prior to the war that **establishing a stable democratic government in postwar Iraq would be a long, difficult and probably turbulent challenge.** In January 2003, the Intelligence Community assessed that building “an Iraqi democracy would be a long, difficult and probably turbulent process, with potential for backsliding into Iraq’s tradition of authoritarianism.”¹⁵ The greatest medium-to-long term challenge in Iraq would be the “introduction of a stable and representative political system.”¹⁶ The Intelligence Community noted that Iraqi political culture did “not foster liberalism or democracy”¹⁷ and was “largely bereft of the social underpinnings that directly support development of broad-based participatory democracy.”¹⁸ Although the idea of free and democratic elections probably would be a popular concept with the vast majority of the Iraqi population, “the practical implementation of democratic rule would be difficult in a country with no concept of loyal opposition and no history of alternation of power.”¹⁹

■ The Intelligence Community noted factors that favored the development of democracy: “the relatively low politicization of Iraqi Shiism” and “discredited” secular authoritarian nationalism.²⁰ This did “not mean, however, that the trend [political Islam] could not take root in postwar Iraq, particularly if economic recovery were slow and foreign troops remained in the country for a long period.”²¹ In addition, the Intelligence Community cited “the contributions that could be made by four million Iraqi exiles – many of whom are Westernized and well educated – and by the now impoverished and underemployed Iraqi middle class,”²² but noted that opposition parties did “not have the popular, political or military capabilities to play a leading role After Saddam’s departure without significant and prolonged external economic, political and military support.”²³

¹⁵ NIC: Principal Challenges in Post-Saddam Iraq, p. 5

¹⁶ NIC: Principal Challenges, p. 5

¹⁷ NIC: Principal Challenges, p. 5

¹⁸ NIC: Principal Challenges, p. 13

¹⁹ NIC: Principal Challenges, p. 14

²⁰ NIC: Principal Challenges, p. 15

²¹ NIC: Principal Challenges, p. 15

²² NIC: Principal Challenges, p. 5

²³ NIC: Principal Challenges, p. 17

■ Terrorism

■ The Intelligence Community assessed prior to the war that al-Qa'ida probably would see an opportunity to accelerate its operational tempo and increase terrorist attacks during and after a US-Iraq war. In January 2003, the Intelligence Community stated that al-Qa'ida "probably would try to exploit any postwar transition in Iraq by replicating the tactics it has used in Afghanistan during the past year to mount hit-and-run operations against US personnel."²⁴ According to the Intelligence Community, "some militant Islamists in Iraq might benefit from increases in funding and popular support and could choose to conduct terrorist attacks against US forces in Iraq."²⁵ The Intelligence Community assessed that, "If Baghdad were unable to exert control over the Iraqi countryside, al-Qai'da or other terrorist groups could operate from remote areas."²⁶ The Intelligence Community assessed that "To the extent that a new Iraqi government effectively controlled its territory, especially in northern Iraq, and was friendlier to US interests and backed by US military power, al-Qa'ida's freedom of movement inside Iraq almost certainly would be hampered. If al-Qa'ida mobilized significant resources to combat a US presence in Iraq, it could, at least in the near term, reduce its overall capability to strike elsewhere."²⁷ The Intelligence Community noted that "Use of violence by competing factions in Iraq against each other or the United States—Sunni against Shia; Kurd against Kurd; Kurd against Arab; any against the United States—probably also would encourage terrorist groups to take advantage of a volatile security environment to launch attacks within Iraq."²⁸ Additionally, rogue ex-regime elements "could forge an alliance with existing terrorist organizations or act independently to wage guerilla warfare against the new government or Coalition forces."²⁹

■ The Intelligence Community assessed prior to the war that a heightened terrorist threat resulting from a war with Iraq, after an initial spike, probably would decline slowly over the subsequent three to five years. The Intelligence Community assessed that al-Qa'ida probably would see an opportunity to "accelerate its operational tempo and increase terrorist attacks during and after a US-Iraq war."³⁰ The lines between al-Qa'ida and other terrorist groups around the world "could become blurred" in the wake of a US attack and counter attacks by al-Qa'ida and jihadists.³¹ "The targeting by less capable groups

²⁴ NIC: Regional Consequences of Regime Change in Iraq, p.14

²⁵ NIC: Regional Consequences, p. 13

²⁶ NIC: Principal Challenges, p. 6

²⁷ NIC: Regional Consequences, p. 14

²⁸ NIC: Regional Consequences, p. 13

²⁹ NIC: Principal Challenges, p. 38

³⁰ NIC: Regional Consequences, p. 13

³¹ NIC: Regional Consequences, p. 14

[REDACTED]

and planners operating on short notice would mean that such softer targets as US citizens overseas would become more inviting for terrorists.”³² The Intelligence Community also noted that al-Qa’ida “would try to take advantage of US attention on postwar Iraq to reestablish its presence in Afghanistan.”³³ The Intelligence Community assessed that “if al-Qa’ida mobilized significant resources to combat a US presence in Iraq, it could --at least in the near term-- reduce al-Qa’ida’s overall capability to strike elsewhere.”³⁴

(I) Domestic Conflict

(I) The Intelligence Community assessed prior to the war that Iraq was a deeply divided society that likely would engage in violent conflict unless an occupying power prevented it. In January 2003, the Intelligence Community assessed that “a post-Saddam authority would face a deeply divided society with a significant chance that domestic groups would engage in violent conflict with each other unless an occupying force prevented them from doing so.”³⁵ The threat of Shia reprisals for their oppression under Saddam was a “major concern to the Sunni elite and could erupt if not prevented by an occupying force.”³⁶ Sunni Arabs would face possible loss of their longstanding privileged position while Shia would seek increased power. Although some Sunni who had extensive contact with Shia in urban life might be open to a representative political system, some reporting indicated that elements of Sunni society would oppose a regime that did not allow the Sunnis to continue to prevail in the military security services and government.³⁷ Kurds could try to take advantage of Saddam’s departure by seizing some of the large northern oilfields, a move that would elicit a forceful response from Sunni Arabs.³⁸ According to the Intelligence Community, “score settling would occur throughout Iraq between those associated with Saddam’s regime and those who have suffered the most under it.”³⁹ The Intelligence Community assessed that “underlying causes for violence involve political reprisals more than ethnic or sectarian division.”⁴⁰

³² NIC: Regional Consequences, p. 14

³³ NIC: Regional Consequences, p. 14

³⁴ NIC: Regional Consequences, p. 14

³⁵ NIC: Principal Challenges, p. 5

³⁶ NIC: Principal Challenges, p. 20

³⁷ NIC: Principal Challenges, p. 20

³⁸ NIC: Principal Challenges, p. 5

³⁹ NIC: Principal Challenges, p. 5

⁴⁰ NIC: Principal Challenges, p. 20

[REDACTED]



(U) Political Islam

(U) The Intelligence Community assessed prior to the war that the United States' defeat and occupation of Iraq probably would result in a surge of political Islam and increased funding for terrorist groups. In January 2003, the Intelligence Community assessed that a "US-led defeat and occupation of Arab Iraq probably would boost proponents of political Islam"⁴¹ and would result in "calls from Islamists for the people of the region to unite and build up defenses against the West."⁴² Assessments concluded that "funds for terrorist groups probably would increase as a result of Muslim outrage over US action."⁴³ The Intelligence Community also underscored that "in some countries an increase in Islamist sentiment also probably would take the form of greater support for Islamic political parties that seek to come to power through legitimate means."⁴⁴

(U) Influence of Iraq's Neighbors

(U) The Intelligence Community assessed prior to the war that Iraq's neighbors would jockey for influence in Iraq, with activities ranging from humanitarian reconstruction assistance to fomenting strife among Iraq's ethnic and sectarian groups. In January 2003, the Intelligence Community assessed that the objective of most Middle Eastern states regarding a post-Saddam Iraq would be for the territorial integrity of Iraq to remain intact and for a new regime to become neither a source of regional instability nor dominant in the region. The Intelligence Community assessed that Iraq's immediate neighbors would have the greatest stakes in protecting their interests and would be most likely to pose challenges for US goals in post-Saddam Iraq.

(U) The Intelligence Community assessed prior to the war that Iranian leaders would try to influence the shape of post-Saddam Iraq to preserve Iranian security and demonstrate that Iran is an important regional actor. In January 2003, the Intelligence Community assessed that "the degree to which Iran would pursue policies that either support or undermine U.S. goals in Iraq would depend on how Tehran viewed specific threats to its interests and the potential US reaction."⁴⁵ The Intelligence Community assessed that the "more that Iranian leaders perceived that Washington's aims did not challenge Tehran's interests or threaten Iran directly, the better the chance that they would cooperate in the post-war period, or at least not actively undermine US goals."⁴⁶ The Intelligence

⁴¹ NIC: Regional Consequences, p. 13


⁴² NIC: Regional Consequences, p. 13

⁴³ NIC: Regional Consequences, p. 13

⁴⁴ NIC: Regional Consequences, p. 13

⁴⁵ NIC: Regional Consequences, p. 16

⁴⁶ NIC: Regional Consequences, p. 18



[REDACTED]

Community assessed that “some elements in the Iranian government could decide to try to counter aggressively the U.S. presence in Iraq or challenge U.S. goals following the fall of Saddam by attempting to use their contacts in Kurdish and Shia communities to sow dissent against the US presence and complicate the formation of a new, pro-US Iraqi government.”⁴⁷ The Intelligence Community noted that elements in the regime also could “employ their own operatives against US personnel, although this approach would be hard to conceal.”⁴⁸

(U) The Intelligence Community assessed that “guaranteeing Iran a role in the negotiations on the fate of post-Saddam Iraq might persuade some Iranian officials to pursue an overt and constructive means to influence reconstruction in Iraq.”⁴⁹ [REDACTED]

When possible, the establishment of “a mechanism for US and Iranian officials to communicate on the ground in Iraq could facilitate dialogue, [REDACTED]

[REDACTED]

(U) WMD

(U) **The Intelligence Community assessed prior to the war that military action to eliminate Iraqi WMD would not cause other regional states to abandon their WMD programs, or their desire to develop such programs.** The Intelligence Community assessed that for many countries in the Middle East and South Asia, WMD programs “would continue to be viewed as necessary and integral components of an overall national security posture.”⁵⁰ The Intelligence Community cited several reasons that other regional states would not give up WMD, including the need “to survive in a dangerous neighborhood, enhance regional prestige, compensate for conventional military deficiencies, and deter threats from superior adversaries.”⁵¹ The Intelligence Community said “states also would be driven to acquire WMD capabilities or accelerate programs already in train with the hope of developing deterrent capabilities before the programs could be destroyed preemptively.”⁵²

⁴⁷ NIC: Regional Consequences, p. 18

⁴⁸ NIC: Regional Consequences, p.18

⁴⁹ NIC: Regional Consequences, p. 18

⁵⁰ NIC: Regional Consequences, p. 18

⁵¹ NIC: Regional Consequences, p. 18

⁵² NIC: Regional Consequences, p. 7

⁵³ NIC: Regional Consequences, p. 7

⁵⁴ NIC: Regional Consequences, p. 26

[REDACTED]

(I) Security

(I) The Intelligence Community assessed prior to the war that the Iraqi government would have to walk a fine line between dismantling the worst aspects of Saddam's police, security, and intelligence forces and retaining the capability to enforce nationwide peace. In January 2003, the Intelligence Community assessed that "if responsibility for internal security had been passed from an occupying force to an Iraqi government, such a government would have to walk a fine line between dismantling the worst aspects of Saddam's police, security and intelligence forces and retaining the capability to enforce nationwide peace."⁵⁵ The Iraqi Regular Army "has been relatively unpoliticized below the command level and, once purged of the security and intelligence officers embedded within it, could be used for security and law enforcement until police or a local gendarme force is established."⁵⁶ Over the longer term, the police and security forces "would need to be rebuilt and restructured if they were to gain the trust of the Iraqi people and avoid the excesses similar to those under Saddam's rule."⁵⁷

(I) Oil

(I) The Intelligence Community assessed prior to the war that Iraq's large petroleum resources would make economic reconstruction a less difficult challenge than political transformation, but that postwar Iraq would nonetheless face significant economic challenges. Intelligence assessments prior to the war differed on the likelihood that the Iraqi oil system would contribute to reconstruction efforts in the short-term. The Intelligence Community, for example, noted that "if Iraq's oil facilities were relatively undamaged by a war, Baghdad could increase crude oil production from 2.4 million barrels a day (b/d) to about 3.1 million b/d within several months of the end of hostilities."⁵⁸ Assessments noted that while Iraq could draw on its own oil resources for economic reconstruction, political transformation lacked an equivalent domestic resource. The Intelligence Community also assessed that aside from oil, Iraq's economic options would remain "few and narrow without forgiveness of debt, a reduction in reparations from the previous Gulf War, or something akin to a Marshall Plan."⁵⁹

(I) Humanitarian Issues

(I) The Intelligence Community assessed prior to the war that major outside assistance would be required to meet humanitarian needs. In January

⁵⁵ NIC: Principal Challenges, p. 20

⁵⁶ NIC: Principal Challenges, p. 20

⁵⁷ NIC: Principal Challenges, p. 20

⁵⁸ NIC: Principal Challenges, p. 33

⁵⁹ NIC: Principal Challenges, p. 5

[REDACTED]

2003, the Intelligence Community assessed that a prolonged struggle to depose Saddam and install a new regime would be likely to cause more flight of refugees and internally displaced persons and to disrupt severely the distribution of food and health services. The Intelligence Community assessed that the “internal security situation would affect the humanitarian challenge” and that the impact on humanitarian needs of a war “would depend on its length and severity.”⁶⁰ On the topic of refugees, the Intelligence Community reported that a Baghdad-centered military operation would displace 900,000 persons internally and create 1.45 million refugees.⁶¹ Assessments emphasized that the Iraqi population depended heavily on the rations distributed by the government, and that securing the government’s food warehouses after the war and implementing a food distribution system “would be critical to avoiding widespread hunger.”⁶² The civilian healthcare situation probably “would be severely damaged by the war and widespread civil strife.”⁶³

(I) Infrastructure

(I) The Intelligence Community assessed prior to the war that the new Iraqi government would require significant outside assistance to rebuild Iraq’s water and sanitation infrastructure. The Intelligence Community reported that such basic services as electricity and clean water reached less than half the population prior to the war. The Intelligence Community assessed that the “difficulty of restoring such services as water and electricity after a war would depend chiefly on how much destruction was caused by urban combat.”⁶⁴ Assessments noted that “civil strife would cause disruptions in electricity and water purification or distribution if generators, pumps or plants became damaged, seized or looted.”⁶⁵ The Intelligence Community noted that “cuts in electricity or looting of distribution networks could have a cascading disastrous impact on hospitals at a time when casualty rates are likely to be high.”⁶⁶ Although Iraq’s infrastructure already had suffered extensive degradation, the Intelligence Community reported that Iraqis had restored their physical infrastructure quickly after previous wars.⁶⁷

⁶⁰ NIC: Principal Challenges, p. 25

⁶¹ NIC: Principal Challenges, p. 25

⁶² NIC: Principal Challenges, p. 26

⁶³ NIC: Principal Challenges, p. 28

⁶⁴ NIC: Principal Challenges, p. 6

⁶⁵ NIC: Principal Challenges, p. 25

⁶⁶ NIC: Principal Challenges, p. 28

⁶⁷ NIC: Principal Challenges, p. 6

[REDACTED]

